

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KEVIN and BETINA JOHNSON,

Plaintiffs,

$$V.$$

**WELLS FARGO BANK, N.A. and
MORTGAGE CONTRACTING SERVICES,
INC. d/b/a MORTGAGE CONTRACTING
SERVICES, LLC.**

Defendants.

Case No: 1:15-cv-10935

Hon. Virginia M. Kendall

**UNOPPOSED MOTION FOR ENTRY OF AN ORDER EXTENDING TIME
FOR WELLS FARGO BANK, N.A. TO ANSWER, MOVE, OR
OTHERWISE RESPOND TO COMPLAINT**

Defendant Wells Fargo Bank, N.A. (“Wells Fargo”), by its counsel, hereby moves for entry of an Order extending the time by which Wells Fargo must answer, move, or otherwise respond to Plaintiffs’ Complaint. In support of this motion, Wells Fargo states as follows:

1. Plaintiffs filed their Complaint on December 4, 2015 (Dkt. 1).
2. The Complaint was served on Wells Fargo on December 18, 2015 (Dkt. 8).
3. Accordingly, Wells Fargo is currently required to answer or otherwise respond to the Complaint by January 8, 2016.
4. Wells Fargo recently retained Mayer Brown LLP for representation in this matter and counsel for Wells Fargo has not had sufficient time to evaluate Plaintiffs' Complaint in order to formulate Wells Fargo's response thereto.
5. Wells Fargo respectfully requests that this Court grant Wells Fargo a 30-day extension of time, up to and including February 8, 2016, to answer, move, or otherwise plead in response to Plaintiffs' Complaint.

6. Counsel for Wells Fargo communicated with Plaintiffs' counsel regarding the requested extension. Plaintiffs' counsel confirmed that Plaintiffs do not oppose Wells Fargo's extension request.

7. The extension is not sought for the purpose of delay or harassment. No party will be prejudiced by the allowance of the requested extension and no prior requests for extensions of time have been sought by Wells Fargo in this matter.

WHEREFORE, Defendant Wells Fargo Bank, N.A. respectfully requests that the Court enter an order extending the time for Defendant Wells Fargo Bank, N.A. to answer, move, or otherwise respond to Plaintiffs' Complaint up to and including February 8, 2016.

Dated: January 7, 2016

Respectfully submitted,

/s/ Joseph M. Snapper

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Counsel for Defendant Wells Fargo Bank, N.A.

CERTIFICATE OF SERVICE

I, Joseph M. Snapper, an attorney, hereby certify that on January 7, 2016, I caused a true and correct copy of the foregoing **UNOPPOSED MOTION FOR ENTRY OF AN ORDER EXTENDING TIME FOR WELLS FARGO BANK, N.A. TO ANSWER, MOVE, OR OTHERWISE RESPOND TO COMPLAINT** to be filed and served electronically via the court's CM/ECF system.

/s/ Joseph M. Snapper
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